

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

<div style="display: flex; justify-content: space-between;"><div style="width: 80%;"><p>GERALD A. TAYLOR , Individually and on Behalf of All Others Similarly Situated,</p><p style="text-align: center;">Plaintiff,</p><p style="text-align: center;">v.</p><p>LIFE PARTNERS HOLDINGS, INC., BRIAN D. PARDO, DAVID M. MARTIN, and NINA PIPER,</p><p style="text-align: center;">Defendants.</p></div><div style="width: 10%; text-align: center;">)</div></div>)	<p>No. DR-11-CV-00018-AM</p> <p>CLASS ACTION</p>
<div style="display: flex; justify-content: space-between;"><div style="width: 80%;"><p>SELMA STONE, Individually and on Behalf of All Others Similarly Situated,</p><p style="text-align: center;">Plaintiff,</p><p style="text-align: center;">v.</p><p>LIFE PARTNERS HOLDINGS, INC., BRIAN D. PARDO, DAVID M. MARTIN, and NINA PIPER,</p><p style="text-align: center;">Defendants.</p></div><div style="width: 10%; text-align: center;">)</div></div>)	<p>No. DR-11-CV-00016-AM</p> <p>CLASS ACTION</p>

[Captions Continue on Following Pages]

**NOTICE OF MOTION AND MOTION OF J. MALCOLM GRAY AND
MARK A. WALLENBROCK FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF CO-LEAD COUNSEL**

JEREMY GOAD, Individually and on Behalf of All Others Similarly Situated,) No. DR-11-CV-00017-AM
)

Plaintiff,

v.

LIFE PARTNERS HOLDINGS, INC., BRIAN D.
PARDO, DAVID M. MARTIN, and NINA
PIPER,

Defendants.

) CLASS ACTION

JOY DITTBERNER, Individually and on Behalf of All Others Similarly Situated,)
) No. DR-11-CV-00019-AM

Plaintiff,

v.

LIFE PARTNERS HOLDINGS, INC., BRIAN D.
PARDO, DAVID M. MARTIN, and NINA
PIPER,

Defendants.

) CLASS ACTION

DAVID G. SANTACROCE, Individually and on Behalf of All Others Similarly Situated,)
) No. DR-11-CV-00020-AM

Plaintiff,

v.

LIFE PARTNERS HOLDINGS, INC., BRIAN D.
PARDO, DAVID M. MARTIN, and NINA
PIPER,

Defendants.

) CLASS ACTION

[Captions Continue on Following Page]

J. MALCOLM GRAY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

V.

LIFE PARTNERS HOLDINGS, INC., BRIAN D.
PARDO, DAVID M. MARTIN, and NINA
PIPER,

Defendants.

) No. DR-11-CV-00021-AM

) CLASS ACTION

NOTICE OF MOTION

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE, that lead plaintiff movants J. Malcolm Gray and Mark A. Wallenbrock (collectively “Movants”) hereby move, under §§21D *et seq.* of the Securities Exchange Act of 1934 (the “Exchange Act”) as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), for an order (a) consolidating related actions, (b) appointing J. Malcolm Gray and Mark A. Wallenbrock as lead plaintiff, and (c) approving their selection of Harwood Feffer LLP and Glancy Binkow & Goldberg LLP as co-lead counsel for the Class.

This motion is brought pursuant to the Exchange Act, the Federal Rules of Civil Procedure and the PSLRA. This motion is based on this Notice, the attached memorandum of points and authorities, the declaration of Willie Briscoe, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

COMPLIANCE WITH CIVIL LOCAL RULE CV-7(h)

This motion is filed pursuant to Section 21D of the Exchange Act, as amended by the PSLRA. This Section provides that within 60 days after publication of the required notice, any member of the proposed class may apply to the Court to be appointed as lead plaintiff, whether or not they have previously filed a complaint in the underlying action. Consequently, counsel for Movants has no way of knowing who, if any, the competing lead plaintiff candidates are at this time. As a result, counsel for Movants have been unable to conference with opposing counsel as prescribed in Local Rule CV-7(h), and respectfully request that the conference requirement of Local Rule CV-7(h) be waived for this motion. Pursuant to §78u-4(a)(3)(B)(iii)(II) of the Exchange Act, defendants do not have standing to oppose the appointment of Movants as lead plaintiff. *See also Takeda v. Turbodyne Techs., Inc.*, 67 F. Supp. 2d. 1129, 1138 (C.D. Cal. 1999).

DATED: April 4, 2011

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